



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

October 25, 2019

BY ECF

Honorable Paul G. Gardephe
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

Re: *United States v. Christopher Hammatt, et al.*, 19 Cr. 67 (PGG)

Dear Judge Gardephe,

The Government writes on behalf of all parties to respectfully request an adjournment of the October 29, 2019 pretrial conference in the above-referenced matter. As previously discussed, the Government has encountered multiple technical issues retrieving and processing email files from defendant Edwin Tanglao's email account hosted by Amazon. Since the last conference, the Government has encountered additional unforeseen obstacles to processing the data. This week, the Government expects to produce more than 40,000 such files to the defense. This is the last item of voluminous discovery that the Government intends to produce to the defense.

After consulting with counsel for each of the defendant's, the parties are requesting an adjournment of 60 days so that the defense can continue to review the voluminous discovery already produced and review the voluminous discovery that will be produced this week.

The Government further requests, with the consent of all parties, that time be prospectively excluded under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A), between October 29, 2019 and the date of the next pretrial conference. The Government submits that the ends of justice served by the exclusion outweigh the best interests of the public and the defendants in a speedy trial, because it will permit defense counsel additional time to review discovery and for the parties to discuss a possible disposition.

Very truly yours,

GEOFFREY S. BERMAN
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